

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

THOMAS WHITEHILL,

Plaintiff,

v.

Civil Action No. 4:23-cv-01030

ASTRAZENECA PHARMACEUTICALS
LP,

Defendant.

**PLAINTIFF'S CONSENT MOTION FOR EXTENSION
OF TIME TO FILE THE PARTIES' FINALIZED ADR REPORT**

Pursuant to the Court's Orders of January 24, 2025 (ECF 45) and January 28, 2025 (ECF 47), and February 18, 2025 (ECF 49), Plaintiff Thomas Whitehill respectfully moves the Court to grant a fourteen (14) day extension of time, through and including March 10, 2025, in which to file the parties' *finalized* ADR report, specifying the date and time of the ADR conference. The parties conferred and selected a mediator. *See Exhibit A, Draft ADR Report*, listing neutral Hon. Donald Wilkerson. The Parties have communicated with Hon. Donald Wilkerson who has agreed to mediate the case. The Parties are currently working on scheduling the mediation, which they anticipate occurring within the next 60 days. *Defendant consents to this motion.* This request for time extension is not made for delay or for any improper purpose, but only to allow the parties and neutral sufficient time to set the date, time, and location of the ADR conference.

WHEREFORE, Plaintiff, by and through undersigned counsel, and with consent of Defendant AstraZeneca Pharmaceuticals, LP, respectfully requests that the Court grant his motion for extension of time, through and including March 10, 2025, to file the parties' finalized ADR report, and for such other and further relief as the Court deems just and proper.

Dated: February 24, 2025

Respectfully submitted,

/s/ John C. Burns

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Attorney for Plaintiff Thomas Whitehill

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which will send notification to all counsel of record.

/s/ John C. Burns

Attorney